



January 5, 2022

Curaleaf, Inc.
c/o attorney Graham Sweitzer
graham.sweitzer@harrang.com

RE Agbonkhese vs Curaleaf, Inc.
Case No. 3:21-cv-01675-HZ

Ayuba Agbonkhese is a US war veteran who was taken to the emergency room on September 8 after using Curaleaf's tainted CBD drops. Ayuba accepts Curaleaf's offer to allow judgment against Curaleaf in this case for \$50,000.

Though Ayuba's case is now over, he will continue his fight to hold Curaleaf accountable for its reckless behavior. Ayuba will continue to petition for increased government regulation of Curaleaf's operations, and for increased penalties against drug manufacturers like Curaleaf that violate the law.

Ayuba has also committed to appearing as a witness at trial for the family of the late Earl Jacobe, to explain how using Curaleaf's tainted CBD drops affected Ayuba's health. Thank you.

Sincerely,

s/ Michael Fuller
Partner

US Bancorp Tower • 111 SW 5th Ave. • Suite 3150
Portland, Oregon 97204 • 503-222-2000

Graham M. Sweitzer, OSB #025866
graham.sweitzer@harrang.com
HARRANG LONG GARY RUDNICK P.C.
1050 SW Sixth Avenue, Suite 1600
Portland, OR 97204
Telephone: (503) 242-0000
Facsimile: (541) 686-6564
Of Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

AYUBA AGBONKHESE,

Plaintiff,

vs.

CURALEAF, INC.,

Defendant.

Case No. 3:21-cv-01675-HZ

OFFER OF JUDGMENT

Defendant, in accordance with Federal Rule of Procedure (“FRCP”) 68, hereby offers to allow judgment to be taken against it in this action in the total amount of FIFTY THOUSAND NO/100 DOLLARS (\$50,000.00). This offer is intended to be “inclusive,” such that it if accepted Plaintiff would be responsible to satisfy any liens, claims of subrogation right, costs and attorney fees allowable by contract or law.

This Offer of Judgment is made for the purpose specifically set forth in FRCP 68.

///

///

///

///

This Offer of Judgment is not intended to alter or amend Defendant's Answer to the claims and allegations in Plaintiff's Complaint, and therefore shall not be construed either as an admission by Defendant.

DATED this 23rd day of December, 2021.

HARRANG LONG GARY RUDNICK P.C.

By: s/ Graham M. Sweitzer
Graham M. Sweitzer, OSB #025866
Of Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that on December 23, 2021, I served or caused to be served a true and complete copy of the foregoing **OFFER OF JUDGMENT** on the party or parties listed below as follows:

- ☐ Via CM / ECF Filing
- ☒ Via First Class Mail, Postage Prepaid
- ☐ Via Email
- ☐ Via Personal Delivery

Michael Fuller, OSB #093570
OlsenDaines
111 SW Fifth Avenue, Suite 3150
Portland, OR 97204
Phone: 503-222-2000
Email: michael@underdoglawyer.com

Kelly D. Jones, OSB #074217
Law Offices of Kelly D. Jones
819 SE Morrison Street, Suite 255
Portland, OR 97214
Phone: 503-847-4329
Email: Kellydonovanjones@gmail.com

Attorneys for plaintiffs

HARRANG LONG GARY RUDNICK P.C.

By: s/ Graham M. Sweitzer
Graham M. Sweitzer, OSB #025866
Of Attorneys for Defendant

PROOF OF SERVICE

I certify that on the date below I caused this document to be served on all parties via CM/ECF and by email to:

Curaleaf, Inc.
c/o attorney Graham Sweitzer
graham.sweitzer@harrang.com

January 5, 2022

s/ Michael Fuller
Michael Fuller, OSB No. 09357
Lead Trial Attorney for Plaintiff
OlsenDaines
US Bancorp Tower
111 SW 5th Ave., Suite 3150
Portland, Oregon 97204
michael@underdoglawyer.com
Direct 503-222-2000